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The Transamerica Pyramid
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12 Attorneys for Plaintiff,
13 SARA G. MAURER

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA

16 SARA G. MAURER,)
17)
18 Plaintiff,)
19)
20 v.)
21)
22 RELIANCE STANDARD LIFE)
23 INSURANCE COMPANY; MICHAEL)
24 S. BOWLES; and DOES 1 through 20,)
25 inclusive,)
26 Defendants.)

Case No. CV-08-04109-MMC

**STIPULATION AND ~~PROPOSED~~
ORDER CONTINUING THE DEADLINE
TO FILE PLAINTIFF'S MOTION TO
REMAND**

27 Plaintiff Sara Maurer ("Plaintiff"), and Defendants Reliance Standard Life Insurance
28 Company and Michael Bowles ("Defendants"), by and through their respective counsel of
record, hereby stipulate and agree as follows:

1. Plaintiff's Complaint was filed on July 15, 2008 and Defendants' Notice of
Removal was filed on August 28, 2008.

2. Plaintiff and Defendants are meeting and conferring to determine and clarify
jurisdictional issues potentially relevant to a Motion to Remand by Plaintiff. The parties agree
and stipulate that to the extent that Plaintiff seeks to raise claims based upon procedural defects

1 in the removal in a remand motion which must be raised within 30 days, such 30-day deadline
2 is extended 30 days, or from September 29, 2008 to October 29, 2008.

3 3. Accordingly, the parties agree that an extension of Plaintiff's deadline to move
4 for remand based upon procedural defects is hereby extended to October 29, 2008.

5
6 DATED: September 26, 2008 PILLSBURY & LEVINSON, LLP

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8 By: _____ /s/
9 Rebecca Grey
10 Attorneys for Plaintiff
11 SARA G. MAURER

12 Dated: September 26, 2008 GREEN & HUMBERT

13
14 By: _____
15 Horace W. Green
16 Attorneys for Defendant
17 RELIANCE STANDARD LIFE INSURANCE
18 COMPANY

19 **ORDER**

20 IT IS SO ORDERED.

21 Dated: _____
22 Maxine M. Chesney
23 Judge of the United States District Court
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in the removal in a remand motion which must be raised within 30 days, such 30-day deadline is extended 30 days, or from September 29, 2008 to October 29, 2008.

3. Accordingly, the parties agree that an extension of Plaintiff's deadline to move for remand based upon procedural defects is hereby extended to October 29, 2008.

DATED: September __, 2008

PILLSBURY & LEVINSON, LLP

By: _____
Rebecca Grey
Attorneys for Plaintiff
SARA G. MAURER

Dated: September 26, 2008

GREEN & HUMBERT

By: _____
Horace W. Green
Attorneys for Defendant
RELIANCE STANDARD LIFE INSURANCE
COMPANY

ORDER

IT IS SO ORDERED.

Dated: September 29, 2008


Marlene M. Chesney
Judge of the United States District Court